

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Samuel Pierce,

Plaintiff,

vs.

Clare Connors, in her personal and
official capacity, David Ige, in his
personal and official capacity, State of
Hawaii

Defendant(s)

CIVIL NO. CV21-00351 JMS KJM

DECLARATION OF HILTON R.
RAETHEL

DECLARATION OF HILTON R. RAETHEL

I, HILTON R. RAETHEL, do hereby declare as follows:

1. I am the President and Chief Executive Officer (“CEO”) of the Healthcare Association of Hawaii (HAH). I have been employed in this position for four (4) years. In my position as President and CEO, I oversee all operations of HAH, conduct regular meetings with member constituent groups, and advocate on behalf of our members with legislators at both a state and federal level, with regulators at both a state and federal level, and with payors and other organizations and entities our members interact with.

2. The Healthcare Association of Hawaii (“HAH”) is composed of 170 member organizations which include the acute care hospitals in Hawaii, public and

private skilled nursing facilities, the Medicare certified home health agencies, hospices, assisted living facilities, durable medical equipment suppliers, and home infusion/pharmacies. The primary focus of HAH is working with healthcare executives and their 30,000 employees on vital industry issues such as advocacy (in Washington, D.C. and Hawaii), quality and reimbursement improvement, strategic education, emergency preparedness, and other related health care issues.

3. The Hawaii Healthcare Emergency Management Coalition (the “Coalition”) is a program within Hawaii Hospital Education and Research Foundation (HHERF), a wholly owned subsidiary of HAH, and is a statewide federally qualified healthcare coalition program, providing a unique array of statewide healthcare emergency management services and capabilities. During the COVID-19 pandemic, the Coalition has played a key role in making sure that healthcare organizations provided safer care for patients and residents. This role included ordering and dispersing personal protective equipment (“PPE”) to hospitals and other medical care facilities and workers, providing critical information and situational updates daily to members, the State Department of Health (“DOH”) and other agencies, coordinating the response to member requests, such as PPE, equipment needs, staffing shortages, and other needs, and many other services including assisting health care facilities with their Emergency Operations Centers.

4. I have personal knowledge of and am competent to make this Declaration concerning the matters set forth below.

5. In June, 2021, the number of hospitalizations, State-wide, for COVID-19 patients was 1,019, with 275 of those patients in the Intensive Care Unit (“ICU”), and the remainder in other units of the hospitals.


6. In July, 2021, the number of hospitalizations, State-wide, for COVID-19 patients was 2,018, with 429 of those patients in the ICU, and the remainder in other units of the hospitals.

7. In August, 2021, the number of hospitalizations, State-wide, for COVID-19 patients was 9,285, with 1,871 of those patients in the ICU, and the remainder in other units of the hospitals.

8. In August, 2021, the number of hospitalizations, State-wide, for COVID-19 patients was the highest number since the pandemic began in Hawaii in March, 2020.

I, HILTON R. RAETHEL, DO DECLARE UNDER
PENALTY OF LAW THAT THE FOREGOING IS TRUE
AND CORRECT.

DATED: Honolulu, Hawaii, 09/02/21.



HILTON R. RAETHEL